

January 22, 2002

SENT VIA FACSIMILE

Lydia E. Berry
Processed Products Branch
AMS Fruit & Vegetable Programs
USDA Stop 0247
1400 Independence Ave., SW
Washington, DC 20250-0247

SUBJECT: Comments by the Pennsylvania Farm Bureau on the New Proposed standards for Grades of Apple Juice from Concentrate, Federal Register, November 21, 2001, page 58431.

Pennsylvania Farm Bureau is submitting the following comments in response to the federal register notice on November 21, 2001, requesting comments on the above referenced subject.

Pennsylvania Farm Bureau is the state's largest general farm organization representing over 28,000 rural and farmer member families. Our members who grow apples market on average as much as fifty percent of their crop for juice and concentrate. Pennsylvania is the fifth largest apple producing state in the nation. These standards and the proposed changes are very important to the Pennsylvania apple industry.

Pennsylvania Farm Bureau strongly opposes the proposed grade standards for the following reasons:

1. The grade standards that exist today have become the acknowledged standard in trade and a means of gauging value in the marketplace. **The current standard encourages the use of domestically grown apples, which are mostly high acid.** The proposed standard will further jeopardize our state and nation's apple growers' markets, which have already been severely damaged by other countries that are currently circumventing our trade laws and dumping apple juice concentrate into this country.
2. **If the proposed standards were to take affect, this would create yet another loophole for cheap foreign apple juice concentrate to be used in government food programs.** Foreign apple juice concentrate is already being heavily utilized for manufacture of apple juice in this country. The quality of this product is so poor that a synthetic form of malic acid is used to bring back acceptable flavor for the consumer. **This proposal will not only lead to increased use of foreign product, but will also lead to a reduction of the overall quality of the product.**

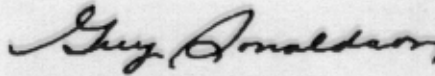
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Pennsylvania Farm Bureau urges USDA to continue to demonstrate its support for American agriculture and not support the proposed grade standards issued for public comment in the federal register notice on November 21, 2001.

Thank you for your consideration of comments submitted regarding this vital issue to our state's apple growers.

Sincerely,

A handwritten signature in cursive script, reading "Guy Donaldson".

Guy Donaldson, President
Pennsylvania Farm Bureau